

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE SOUTHERN DISTRICT OF TEXAS  
HOUSTON DIVISION**

In re:	§	
	§	Chapter 11
TREESAP FARMS, LLC, <i>et al.</i> ,	§	
	§	Case No. 25-90017 (ARP)
Debtors. <sup>1</sup>	§	
	§	(Jointly Administered)
	§	
	§	

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**STIPULATION EXTENDING THE UNITED STATES TRUSTEE’S  
RESPONSE DEADLINE TO DEBTORS’ KERP/KEIP MOTION  
[Relates to Docket No. 188]**

This stipulation is entered into by and between the above-captioned debtors (the “Debtors”) and Kevin M. Epstein, the United States Trustee for Region 7 (the “Trustee” and, together with the Debtors, the “Parties”), which hereby stipulate and agree as follows:

**WHEREAS**, on February 24, 2025, each of the Debtors filed a petition for relief under chapter 11 of title 11 of the United States Code in the Bankruptcy Court for the Southern District of Texas (the “Court”);

**WHEREAS**, on April 9, 2025, the Debtors filed the *Debtors’ Motion for Entry of an Order (I) Authorizing and Approving the Debtors’ (A) Key Employee Retention Plan for Non-Insider Employees and (B) Key Employee Incentive Plan; and (II) Granting Related Relief* [Docket No. 188] (the “KERP/KEIP Motion”);

**WHEREAS**, responses to the KERP/KEIP Motion are required to be filed and served on or prior to April 30, 2025 (the “Response Deadline”); and

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<sup>1</sup> The Debtors in the Chapter 11 Cases and the last four digits of their federal tax identification numbers are as follows: TreeSap Farms, LLC (5183); TSH Opco, LLC (4697); TSV Opco, LLC (5418); TSV Reco, LLC (4953); and TreeSap Florida, LLC (5331). The location of the Debtors’ principal place of business and the Debtors’ service address in the Chapter 11 Cases is TreeSap Farms, LLC, 5151 Mitchelldale St., Suite B-2, Houston, TX 77292-5279.

**WHEREAS**, the Parties have agreed to extend the Trustee's Response Deadline as set forth below.

**IT IS THEREFOR STIPULATED AND AGREED TO BY THE PARTIES THAT:**

1. The Trustee's deadline to respond to the Debtors' KERP/KEIP Motion is extended through and including May 12, 2025.

Dated: April 30, 2025

**STIPULATED AND AGREED TO BY:**

By: Timothy A. ("Tad") Davidson II  
**HUNTON ANDREWS KURTH LLP**  
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(Tex. Bar No. 24012503)  
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KEVIN M. EPSTEIN  
UNITED STATES TRUSTEE

By: Andrew Jiménez  
Andrew Jiménez  
Trial Attorney  
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*Counsel to the Debtors and Debtors in Possession*

**Certificate of Service**

I hereby certify that, on April 30, 2025, a true and correct copy of the foregoing document was served by the Electronic Case Filing System for the United States Bankruptcy Court for the Southern District of Texas on those parties registered to receive electronic notices.

/s/ Timothy A. ("Tad") Davidson II  
Timothy A. ("Tad") Davidson II